

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

STEVES AND SONS, INC.,

Plaintiff,

V.

JELD-WEN, INC.,

Defendant.

Civil Action No. 3:20-cv-000098

**STEVES AND SONS, INC.'S MOTION TO FILE ITS RESPONSE TO JELD-WEN,
INC.'S SECOND SUPPLEMENTAL BRIEF IN OPPOSITION TO MOTION FOR
PRELIMINARY INJUNCTION, AND ACCOMPANYING EXHIBITS, UNDER SEAL**

Steves and Sons, Inc. (“Steves”), pursuant to Rule 5 of the Local Civil Rules, respectfully moves the Court for an order sealing portions of its Response to JELD-WEN, Inc.’s Second Supplemental Brief in Opposition to Steves’ Motion for Preliminary Injunction and accompanying Exhibits 1 and 2, under seal.

Steves has legitimate grounds for redaction because the material sought to be filed under seal consists of information JELD-WEN regards as commercially sensitive or reflects information designated as “Highly Confidential” pursuant to the Protective Order entered by this Court. (Dkt. No. 25).

The Response and Exhibits 1 and 2 sought to be filed under seal are being filed electronically with the Court contemporaneously herewith, as required by Local Civil Rule 5. A redacted version of the Response is being publicly filed. As further grounds for this motion, Steves refers to the Memorandum in Support of this Motion, filed contemporaneously herewith.

Dated: March 28, 2020

Respectfully submitted,

STEVES AND SONS, INC.

By: /s/Lewis F. Powell III
Lewis F. Powell III (VSB No. 18266)
Michael Shebelskie (VSB No. 27459)
Maya M. Eckstein VSB No. 41413)
HUNTON ANDREWS KURTH LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219-4074
Telephone: (804) 788-8200
Facsimile: (804) 788-8218
lpowell@hunton.com
mshebelskie@hunton.com
meckstein@hunton.com

Glenn D. Pomerantz
Kyle W. Mach
Emily Curran-Huberty
MUNGER, TOLLES & OLSON LLP
355 S. Grand Avenue, 50th Floor
Los Angeles, CA 90071
Telephone: (213) 683-9132
Facsimile: (213) 683-5161

Marvin G. Pipkin
Kortney Kloppe-Orton
PIPKIN LAW
10001 Reunion Place, Suite 6400
San Antonio, TX 78216
Telephone: (210) 731-6495
Facsimile: (210) 293-2139
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2020 I caused a copy of the foregoing to be electronically filed using the CM/ECF system, which will send notification to counsel of record of such filing by operation of the Court's electronic system. Parties may access this filing via the Court's electronic system.

By /s/Lewis F. Powell III

Lewis F. Powell III